

JUL 24 1984

SWQP-11

Lonnie Brumfield
Pretreatment Coordinator
Indiana State Board of Health
1330 West Michigan Street
Indianapolis, Indiana 46206

Dear Mr. Brumfield:

Please find attached our review comments on Indianapolis' revisions to Activities One-Three, as well as our comments on the City's Activity Five Final Pretreatment Program Submission.

As discussed with you and Dr. Vicky Keramida, Indianapolis' Pretreatment Coordinator, we believe that this Submission is essentially complete and is acceptable for public noticing provided the comments we we offer are addressed prior to the public notice of their program by the State and Region. These major and minor comments are as follows:

1. (major) On Page 17 of Activity Five, the City indicated that the appropriate mechanism for funding the pretreatment program has not been selected yet. The City must identify and select one of the options presented in Activity Five prior to public notice of the program.
2. (major) As required by 5403(b)(2), a statement of endorsement by the local governing body must be submitted prior to public notice of the program.
3. (major) It must be emphasized prior to, and during the public notice of this program, that the proposed interim local limits (derived using removal rates data generated by the pilot plant study) will be revised, finalized and result in more stringent limitations. Dr. Keramida informed me that these final limits will be ready for incorporation into the draft sewer use ordinance prior to formal adoption of the ordinance by City Council. We will need to see these final numbers prior to final enactment of the ordinance and I would strongly suggest that the City also inform affected industries of this change during their public hearing.
4. (major) The City needs to specify a time frame for obtaining information from affected industrial users relative to toxic organics being, or potentially being discharged, to the City's sewer system. This discussion should include information such as, total number of permits already issued to target facilities; when they expire; and when they will be modified to address this concern. This information should be provided prior to program approval. In addition, an updated status of progress being made in this area should be included as a condition of the approved program.

5. (minor) The definition of "Approval Authority" in the ordinance should be modified in accordance with the definition provided in the State's guidance document.

6. (minor) Although it may be implicitly understood, we suggest that Section 27-4(d)(3) of the Ordinance be modified to "prohibit wastewater that exceeds applicable pretreatment standards (i.e., Federal, State, or local, whichever is most stringent)".

7. (minor) The City should delete reference to "national removal rates" as referenced in Section 27-5(a) of the Ordinance as these national rates will be deleted from the proposed revisions to the removal credit regulations. Instead, the City should include language, such as, "as required by 40 CFR 403.7 and any amendments thereto".

8. (minor) Section 27-41 of the Ordinance states that "discharge permits will be issued to affected categorical industries upon the effective date of these standards". It should be made clear that discharge permits will be issued immediately to reflect that standard applicable at the time the City becomes the "Control Authority" which is the most stringent applicable standard (i.e., Federal, State, or local).

If there are any additional State comments to be offered, then we should discuss them at our meeting on July 25, 1984. Provided no substantive comments are forthcoming from the State and the City can adequately address our comments expeditiously, the Region is prepared to notify the City, subsequent to the State's recommendation that their program is acceptable for public notice.

Sincerely yours,

Valerie J. Jones
Regional Pretreatment Coordinator

Attachments

cc: Earl Bohner, ISBH
Joe Stallsmith, ISBH
Larry Kane, ISBH

bcc: Sutfin/Bryson/Fenner
Manzardo/Pratt/Dzikowski
✓ Jones/Barriball/O'Grady
Mustard/Leder/DiDomenico
Martin
Leffin